

1 MICHAEL A. JACOBS (CA SBN 111664)
MJacobs@mofo.com
2 ARTURO J. GONZÁLEZ (CA SBN 121490)
AGonzalez@mofo.com
3 MORRISON & FOERSTER LLP
425 Market Street
4 San Francisco, California 94105-2482
Telephone: 415.268.7000
5 Facsimile: 415.268.7522

6 KAREN L. DUNN (*Pro Hac Vice*)
kdunn@bsflp.com
7 HAMISH P.M. HUME (*Pro Hac Vice*)
hhume@bsflp.com
8 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, N.W.
9 Washington DC 20005
Telephone: 202.237.2727
10 Facsimile: 202.237.6131

11 WILLIAM CARMODY (*Pro Hac Vice*)
bcarmody@susmangodfrey.com
12 SHAWN RABIN (*Pro Hac Vice*)
srabin@SusmanGodfrey.com
13 SUSMAN GODFREY
1301 Avenue of the Americas, 32nd Floor
14 New York, NY 10019-6023
Telephone: 212.336.8330
15 Facsimile: 212.336.8340

16 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
17 and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
MICHELLE YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL THE
DECLARATION OF KEVIN
FAULKNER REGARDING GOOGLE
DRIVE AND GMAIL MIGRATION**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal the Declaration of Kevin Faulkner Regarding Google Drive and Gmail Migration.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Declaration of Kevin Faulkner Regarding Google Drive and Gmail Migration ("Faulkner Declaration")	Highlighted Portions	Defendants

3. The blue-highlighted portions of the Faulkner Declaration contain contact information of a former employee. Defendants request this information be kept under seal to protect the privacy interests of a person involved in this litigation, which is currently the subject of extensive media coverage.

4. The blue-highlighted portions also contain a placeholder domain name used for migration of electronic information. Disclosure of this information could allow others to attempt to compromise the security of Uber's internal electronic information systems by targeting specific placeholder domain names.

5. Defendants' request to seal is narrowly tailored to the portions of the Faulkner Declaration that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of September, 2017 in San Francisco, CA.

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 29, 2017

/s/ Arturo J. González

ARTURO J. GONZALEZ